

EXHIBIT A



Harter Secrest & Emery LLP

ATTORNEYS AND COUNSELORS

WWW.HSELAW.COM

Mark R. Kercher, CPA
5090 Old Goodrich Road
Clarence, NY 14031

File Number: 106915.000001

Please remit payment within 30 days from date of invoice

Kercher, CPA, Mark R.	Date:	07/29/24
RE: Kercher re Mott Receivership	Invoice:	935117
Client Ref:		
For Professional Services Rendered and Costs Advanced through 06/30/24		

<u>Date</u>	<u>Atty</u>	<u>Professional Services</u>	<u>Task Code</u>	<u>Hours</u>	<u>Amount</u>
06/01/24	NSG	Correspondence with M. Kercher regarding revised draft monthly report, real property sale.	B110	0.10	40.00
06/02/24	NSG	Revise first application of M. Kercher for fees and expenses, including A. Snowberger invoice and services.	B110	0.90	360.00
06/02/24	NSG	Correspondence with M. Kercher regarding revised draft fee application.	B110	0.10	40.00
06/03/24	NSG	Correspondence with M. Kercher regarding receiver's report, fee application, financial information exhibit.	B110	0.20	80.00
06/03/24	NSG	Confer and correspondence with J. Horn regarding draft receiver's report.	B110	0.30	120.00
06/03/24	JGH	Review client's proposed edits to preliminary report with N. Gatto.	B110	0.40	190.00
06/03/24	JGH	Finalize activity report at request of M. Kercher.	B110	2.20	1,045.00
06/03/24	NSG	Review Horn revised draft of receiver's report.	B110	0.40	160.00
06/04/24	NSG	Prepare form of proposed order	B110	0.80	320.00

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<u>Date</u>	<u>Atty</u>	<u>Professional Services</u>	<u>Task Code</u>	<u>Hours</u>	<u>Amount</u>
		for payment of Kercher expenses and revise application regarding same.			
06/04/24	NSG	Confer and correspondence with M. Kercher regarding monthly report, financial presentation, finalizing receiver's report and motion for payment of expenses.	B110	0.40	160.00
06/04/24	JGH	Work on fees application and activity report.	B110	0.50	237.50
06/04/24	JGH	Strategize with N. Gatto re potential outcomes of activity report.	B110	0.30	142.50
06/04/24	JGH	Final edits to payment application and proposed order.	B110	0.50	237.50
06/04/24	NSG	Review and revise financial statements from M. Kercher and set up for exhibit to receiver's report.	B110	0.50	200.00
06/04/24	NSG	Correspondence and confer with J. Horn and T. Amplement regarding finalizing for receiver's report and expenses motion, filing of both pleadings, service of same.	B110	0.80	320.00
06/04/24	TLA	Research filing options for Receiver's report and application for fees and costs; revise Receiver's report with Exhibit A and Notice of Motion for Application of Receiver Compensation with Declaration and Exhibits A-C in support of same.	B110	1.70	382.50
06/05/24	NSG	Correspondence with M. Kercher regarding his correspondence with D. Rothenberg.	B110	0.10	40.00
06/05/24	NSG	Call with M. Kercher and J. Horn regarding final discussion prior to filing receiver's repo	B110	0.60	240.00
06/05/24	NSG	Confer with J. Horn and T. Amplement regarding revisions to papers to be filed.	B110	0.10	40.00

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06/05/24	NSG	Correspondence with T. Amplement regarding notice of motion, report exhibits and revisions.	B110	0.30	120.00
06/05/24	JGH	Multiple conversations with paralegal, N. Gatto, and M. Kercher re financial presentation exhibit to report, preliminary activity report, and related matters.	B110	1.90	902.50
06/05/24	JGH	Calls with client regarding potential litigation and insurance coverage questions.	B110	0.40	190.00
06/05/24	NSG	Final review and comment to motion and report to be filed today.	B110	0.20	80.00
06/05/24	NSG	Correspondence and conferences with J. Horn and T. Amplement regarding revisions to motion and report, comments, filing procedures.	B110	0.40	160.00
06/05/24	TLA	Revise Receivers Report and attached Exhibit A; revise Notice of Motion for Application for fees; discuss same with N. Gatto and J. Horn; finalize and file Receiver's Report with Exhibit A and Motion for First Application for Compensation.	B110	2.90	652.50
06/06/24	NSG	Correspondence with D. Rothenberg regarding asset recovery litigation.	B110	0.10	40.00
06/06/24	JGH	Communicate with defendant's counsel at request of M. Kercher to strategize re potential recovery action(s).	B110	0.20	95.00
06/06/24	NSG	Correspondence with J. Horn regarding his call with Rothenbergs.	B110	0.10	40.00
06/06/24	JGH	Call with D. and M. Rothenberg re potential funds-recovery action.	B110	0.50	237.50
06/06/24	JGH	Prepare update for client regarding potential fund-	B110	0.20	95.00

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		recovery action.			
06/07/24	NSG	Review new Mott docket entries.	B110	0.10	40.00
06/08/24	NSG	Correspondence with M. Kercher and T. Fitzgerald regarding Genesee Construction Services.	B110	0.20	80.00
06/10/24	NSG	Correspondence with M. Kercher and J. Horn regarding compensation order.	B110	0.20	80.00
06/12/24	NSG	Correspondence and confer with M. Kercher and J. Horn regarding Buffalo News article, press requests.	B110	0.30	120.00
06/12/24	JGH	Emails and texts with client re press coverage.	B110	0.30	142.50
06/12/24	JGH	Strategize with client re PR considerations in light of Buffalo News coverage of receiver's report.	B110	0.30	142.50
06/12/24	NSG	Confer and correspondence with J. Horn regarding Tucker demand letter.	B110	0.20	80.00
06/12/24	JGH	Stategize with N. Gatto re demand letter re Crescent Beach.	B110	0.30	142.50
06/12/24	JGH	Prepare email to M. Kercher re Crescent Beach demand letter.	B110	0.10	47.50
06/13/24	NSG	Correspondence with J. Horn regarding new docket entries.	B110	0.10	40.00
06/13/24	NSG	Review case docket as to new entries.	B110	0.10	40.00
06/14/24	NSG	Confer with M. Kercher regarding status of sale, motion to dismiss, records.	B110	0.20	80.00
06/14/24	NSG	Correspondence with J. Horn regarding motion to dismiss, our fees and review of prebill.	B110	0.10	40.00
06/14/24	NSG	Correspondence with M. Kercher and J. Horn regarding Five Star Bank account statements.	B110	0.20	80.00
06/14/24	NSG	Review motion to dismiss.	B110	0.20	80.00
06/14/24	JGH	Review motion to dismiss filed by defendants.	B110	0.30	142.50
06/14/24	JGH	Call with M. Kercher re defendants' motion to dismiss	B110	0.40	190.00

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		and related matters; coordinate copying job.			
06/14/24	JGH	Analyze and give direction re copy and scanning job requested by M. Kercher.	B110	0.30	142.50
06/17/24	NSG	Correspondence with M. Kercher and J. Horn regarding expense applications.	B110	0.20	80.00
06/18/24	NSG	Correspondence with M. Kercher and J. Horn regarding preparation of next monthly report.	B110	0.20	80.00
06/19/24	NSG	Begin draft first fee application for HSE.	B110	0.70	280.00
06/20/24	NSG	Continue draft fee application for HSE.	B110	0.60	240.00
06/20/24	NSG	Review docket notices.	B110	0.10	40.00
06/20/24	NSG	Correspondence with T. Amplement and J. Horn regarding Ridgement CC letter to Judge Geraci.	B110	0.20	80.00
06/20/24	NSG	Review Ridgement CC letter.	B110	0.10	40.00
06/20/24	JGH	Conduct preliminary review of two motions to dismiss and "letter motion" filed by Ridgement Country Club.	B110	0.30	142.50
06/20/24	NSG	Discuss Ridgement CC letter with J. Horn.	B110	0.10	40.00
06/20/24	TLA	Review motions to dismiss by defendants Harris and Pagano; review letter filed by Ridgement Country Club; forward all to client.	B110	0.40	90.00
06/20/24	JGH	Discuss recently filed motions, and potential implications for Receiver, with N. Gatto.	B110	0.30	142.50
06/21/24	NSG	Correspondence with M. Karcher regarding incoming May time records and fee application and review Kercher time records for May.	B110	1.00	400.00
06/21/24	JGH	Review and respond to email from client regarding fee application and activity report.	B110	0.30	142.50

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06/21/24	NSG	Begin draft HSE fee application.	B110	0.40	160.00
06/24/24	NSG	Correspondence with J. Horn regarding preparation of HSE fee application.	B110	0.20	80.00
06/24/24	NSG	Draft HSE fee application for May 2024.	B110	2.50	1,000.00
06/25/24	NSG	Review and edit M. Kercher time entries and correspondence with M. Kercher regarding same.	B110	0.60	240.00
06/25/24	TLA	Review Order denying motion by Ridgemont Country Club and forward same to client.	B110	0.20	45.00
06/25/24	NSG	Begin Kercher form of May fee appliction.	B110	0.50	200.00
06/27/24	TLA	Review motion to dismiss filed by defendant LaRocca and corresponding text scheduling order from the Court and forward same to M. Kercher.	B110	0.20	45.00
06/28/24	NSG	Draft M. Kercher May fee application.	B110	1.50	600.00
06/28/24	NSG	Correspondence with M. Kercher regarding his May fee application, backup materials.	B110	0.30	120.00
Total Hours and Fees				32.90	\$12,965.00

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Amplement, Tracy L., Paralegal	5.40	225.00	1,215.00
Gatto, Nicholas S., Counsel	17.50	400.00	7,000.00
Horn, John G., Partner	10.00	475.00	4,750.00
Total Current Fees			\$12,965.00

Current Invoice Due \$12,965.00

Y-T-D Fees: \$30,365.00 / Y-T-D Costs: \$0.00